

Ford. Marrin

VIA ECF

Hon. Sarah L. Cave
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan US Courthouse
500 Pearl Street
New York, New York 10007-1025

Attorneys at Law.

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Re: *PriMed Pharmaceuticals, LLC v. Starr Indemnity & Liability Company*
Civil Action No.: 21-cv-01025(PGG)(SLC)

Your Honor:

We represent defendant, Starr Indemnity & Liability Company ("Starr") in the above action, and write pursuant §I.G.2 of the Individual Practices in Civil Cases of Your Honor as well as the Protective Order, entered on June 30, 2021 for the purpose of requesting permission to redact price information as well as to file under seal two (2) e-mail offers of plaintiff, PriMed Pharmaceuticals, LLC ("PriMed") and two (2) deposition transcripts of the President of PriMed, Matthew Zeigler ("Zeigler") in connection with the Starr's Cross-Motion for Summary Judgment.

By Sealing Order, dated 8/4/22 [ECF Doc. No. 84], Your Honor granted PriMed's motion to seal two (2) e-mail offers, one dated 7/24/14 and the other dated 8/18/14 because PriMed had designated them as "Highly Confidential" under the Protective Order. Starr requests permission to file these same documents under seal and to redact those portions of Starr's Memo of Law in Support of its Cross-Motion for Summary Judgment and Counterstatement of Undisputed Material Facts that make reference to pricing information of the glucose test strips contained in the above e-mails. Those e-mails are attached to the Declaration of the undersigned as Exhibits K & L, respectively. Starr also requests permission to file under seal the Deposition Transcript of Zeigler, dated 6/7/17 & 2/3/22, which are attached as Exhibits I & J, respectively, to the Declaration of the undersigned on the grounds that PriMed has marked those deposition transcripts as "Highly Confidential" under the Protective Order.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Alfred L. D'Isernia

Alfred L. D'Isernia

cc: All Counsel (via ECF)

Defendant's letter-motion seeking to seal e-mail offers and deposition transcripts (ECF No. 89) is GRANTED. The documents at ECF No. 92-95 shall remain visible only to the selected parties.

The Clerk of Court is respectfully directed to close ECF Nos. 89 and 92-95.

SO ORDERED 10/11/22


SARAH L. CAVE
United States Magistrate Judge